

JUN 22 2007Application No: 10/731,029
Attorney's Docket No: ALC 3104**REMARKS/ARGUMENTS**

Claims 1- 20 are pending in the present application, of which claims 1, 10, and 17 are independent. Claims 1, 8, 9, 13, 16; and 19 are amended.

SPECIFICATION

In sections 2, 3, and 4 on page 2, the Office Action objects to the specification for the specified reasons. The specification is amended to clarify terms and remove a hyperlink. Applicant respectfully submits that the specification complies with all applicable requirements. For at least the foregoing reasons, Applicant respectfully requests that the objections to the specification be withdrawn.

CLAIM OBJECTIONS

In section 5 on page 2, the Office Action objects to claim 19 for the specified reason. Applicant respectfully submits that claim 19, as amended, complies with all applicable requirements. For at least the foregoing reasons, Applicant respectfully requests that the objection to claim 19 be withdrawn.

REJECTION UNDER 35 U.S.C. § 112

In section 7 on page 3, the Office Action rejects claims 15 and 20 under 35 U.S.C. § 112, first paragraph, for allegedly failing to comply with the written description requirement. Applicant respectfully traverses this rejection.

Application No: 10/731,029
Attorney's Docket No: ALC 3104

The Office Action states that the "disclosure is directed to an IEEE 802.11-type network." Applicant respectfully disagrees with the assertion. Applicant's specification is replete with references to "wireless networks," "wireless communication networks," "wireless nodes," etc. and is in no way limited to an IEEE 802.11-type network. In fact, the specification specifically states that the invention "does not require any specialized, costly equipment" and that implementation "does not require any change to any wireless network standard to operate." See paragraphs [0020]-[0021]. The sole reference to an IEEE 802.11 network in the detailed description section is a description of an exemplary embodiment, which states, "For instance, in the case of an 802.11 network . . ." (emphasis added). See paragraph [0033]. This reference further demonstrates that, although the disclosure is applicable to 802.11 networks, it is equally applicable to all types of wireless networks.

Given the applicability of Applicant's disclosure to any wireless network technology, Applicant submits that the specification describes "the claimed invention in sufficient detail that one skilled in the art can reasonably conclude that the inventor had possession of the claimed invention." See MPEP § 2163. Applicant also notes that claims 15 and 20 are in their original form as filed with the application and are therefore subject to a "strong presumption" that they satisfy the written description requirement because the language of the originally filed claims is included in the written description of the application. *Id.*

Accordingly, Applicant respectfully submits that claims 15 and 20 meet all requirements of 35 U.S.C. § 112. For at least the forgoing reasons, Applicant respectfully requests that the rejection of claims 15 and 20 under 35 U.S.C. § 112 be withdrawn.

Application No: 10/731,029
Attorney's Docket No: ALC 3104

REJECTION UNDER 35 U.S.C. § 102

In section 9 on page 3, the Office Action rejects claims 1-20 under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent Number 6,745,333 to Thomsen (hereinafter "Thomsen"). Applicant respectfully traverses this rejection.

Claim 1 recites "providing the intrusion detection module with a copy of original data frames transmitted by the wireless node over a wireless interface." Claims 10 and 17 contain similar recitations.

Applicant respectfully submits that Thomsen does not disclose, teach, or suggest the subject matter quoted above. The Office Action alleges that Thomsen discloses this subject matter in its description of a method of detection of spoofing by searching for changing MAC addresses. See col. 10, ln. 64. The authenticating device of Thomsen logs a correspondence between a unique entity identifier of an entity, such as the MAC address, and the IP address assigned to that entity. See col. 11, ln. 18-28. Data packets transmitted by the client device include the IP address assigned by the DHCP server as its source. See col. 11, ln. 34-42. The correspondence stored on the authenticating device is later used for comparison with the MAC and IP addresses contained in received data. See col. 12, ln. 50-64. The system of Thomsen therefore only logs a correspondence between MAC and IP addresses and does not receive a copy of original data frames transmitted by the wireless node.

Accordingly, Applicant respectfully submits that Thomsen does not disclose, teach, or suggest "providing the intrusion detection module with a copy of original data frames

Application No: 10/731,029
Attorney's Docket No: ALC 3104

transmitted by the wireless node over a wireless interface," as recited in claim 1 and similarly recited in claims 10 and 17.

Claim 1 also recites "comparing at the intrusion detection module the information in the copy with the information in the incoming data frames." Claims 10 and 17 contain similar recitations.

Applicant respectfully submits that Thomsen does not disclose, teach, or suggest the subject matter quoted above. Upon receipt of data from an entity such as a client device, the system of Thomsen compares the assigned identifying address and the identifier purporting to be the unique entity identifier to the entry in the log of correspondence of IP addresses to MAC addresses. See col. 12, ln. 50-63. If the system determines that a MAC address associated with a particular IP address accompanying the data packet message has changed, it could be indicative of spoofing activity. See col. 13, ln. 5-8.

Thus, the system of Thomsen compares MAC addresses in order to determine whether spoofing activity has occurred and does not compare information in the copy with information in the incoming data frames. In other words, the system of Thomsen determines a discrepancy between MAC addresses, not information contained in data frames.

Accordingly, Applicant respectfully submits that Thomsen does not disclose, teach, or suggest "comparing at the intrusion detection module the information in the copy with the information in the incoming data frames," as recited in claim 1 and similarly recited in claims 10 and 17.

JUN 22 2007Application No: 10/731,029
Attorney's Docket No: ALC 3104

Claims 2-9 depend from allowable claim 1, claims 11-16 depend from allowable claim 10, and claims 18-20 depend from allowable claim 17. Accordingly, claims 2-9, 11-16, and 18-20 are also allowable over Thomsen at least by virtue of their dependencies.

For at least the forgoing reasons, Applicant respectfully requests that the rejection of claims 1-20 under 35 U.S.C. § 102 be withdrawn.

CONCLUSION

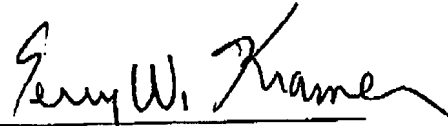
In view of the foregoing, withdrawal of the rejections of record and allowance of this application are earnestly solicited.

While we believe that the instant amendment places the application in condition for allowance, should the Examiner have any further comments or suggestions, it is respectfully requested that the Examiner contact the correspondence attorney listed below in order to expeditiously resolve any outstanding issues.

Application No: 10/731,029
Attorney's Docket No: ALC 3104

In the event that the fees submitted prove to be insufficient in connection with the filing of this paper, please charge our Deposit Account Number 50-0578 and please credit any excess fees to such Deposit Account.

Respectfully submitted,
KRAMER & AMADO, P.C.



Terry W. Kramer
Registration No.: 41,541

Date: 6/22/07

KRAMER & AMADO, P.C.
1725 Duke Street, Suite 240
Alexandria, VA 22314
Phone: 703-519-9801
Fax: 703-519-9802